



NUFARM AMERICAS INC.  
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October 18, 2013

Document Processing Desk (REGFEE)  
Office of Pesticide Programs (7504P)  
US Environmental Protection Agency  
Room S-4900, One Potomac Yard  
2777 South Crystal Drive  
Arlington, VA 22202-4501  
Attention: Mr. Tony Kish, PM (22)

Dear Mr. Kish:

**Subject: Cyclanilide Technical – EPA Reg. No. 35935-XXX**  
**Application for the Registration of a New MUP**  
**Action Code R333; PRIA Service Fee: \$17,993**  
**Pay.gov Tracking ID: 25CQJN26; Agency Tracking ID: 74518748231**  
**ELECTRONIC SUBMISSION**

Please find enclosed an application for the registration of a new Cyclanilide MUP with an unregistered source of active ingredient. Nufarm believes that this product is substantially similar to a registered technical cyclanilide product, EPA Reg. No. 264-565. A transmittal document listing all administrative documents and studies submitted in support of this action is included in this application.

Nufarm would greatly appreciate any assistance you can provide for the completion of this review by the end of June 2014. Cyclanilide is a very effective and important tool for cotton growers. It accelerates opening of mature cotton bolls, promotes defoliation of both mature and juvenile foliage and reduces terminal regrowth resulting in improved defoliation and harvest efficiency as well as greater potential for high quality, high yield cotton harvests. Unfortunately, cotton growers have had only very few options in cyclanilide products until now. Nufarm intends to submit soon an application for the registration of a new end-use product containing cyclanilide that will finally provide growers with an effective and competitive alternative for their harvest aid needs. An early decision for Nufarm's Cyclanilide Technical application would help ensure timely production of the end-use product for the 2014 season. We would appreciate the opportunity to meet with you to discuss the status of this application at your earliest convenience.

Thank you for your cooperation. You can reach me by phone at (919) 379-2530 or by email at [danielle.larochelle@us.nufarm.com](mailto:danielle.larochelle@us.nufarm.com) to schedule a meeting or if you have any questions regarding this submission.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Danielle A. Larochelle', is written over a light blue horizontal line.

Danielle A. Larochelle  
Registration Manager



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## TRANSMITTAL DOCUMENT

### Cyclanilide Technical - EPA Reg. No. 35935-XXX

#### Name and Address of Submitter

Nufarm Limited  
c/o Nufarm Americas Inc., Agent for Nufarm Limited  
4020 Aerial Center Parkway, Suite 101  
Morrisville, NC 27560

#### Company Contact:

Danielle A. Larochelle  
Regulatory Manager

Phone: 919-379-2530

Email: danielle.larochelle@us.nufarm.com

#### Regulatory action in support of which this package is submitted

Cyclanilide Technical – EPA Reg. No. 35935-XXX  
Application for the registration of a new MUP with unregistered source of active ingredient.  
PRIA Action Category: R333

#### Submission Date

October 18, 2013

#### List of Submitted Documents

Volume #	Citation	MRID #
1 of 4	<b>Administrative Materials:</b> 1. Application for Pesticide Amendment_Form 8570-1 2. Cover Letter 3. PRIA Fee Online Payment Confirmation 4. Transmittal Document 5. Certification with Respect to Citation of Data_Form 8570-34 6. Certification with Respect to Label Integrity 7. Data Matrix – Form 8570-35 (EPA Int. copy) 8. Data Matrix – Form 8570-35 (Public version) 9. Proposed Basic CSF dated 10-18-2013 10. Proposed Label [035935-00XXX.20131018.Cyclanilide_New MUP] 11. Study Profile for Cyclanilide Technical Product Chemistry Studies	N/A
<b>GLN Nos. 830.1700, 830.1800</b>		
2 of 4	Wen, H., (2013) Preliminary Analysis and Enforcement Analytical Method of Cyclanilide TGA1 – Validation of Analytical Methodology for the Assay of Active Ingredient and Related Significant Impurities and Subsequent 5-Batch Analysis of Cyclanilide TGA1; August 29, 2013; Study No. NC-2013-025; 110 pages.	49210401

**List of Submitted Documents (*continued*)**

<b>Volume #</b>	<b>Citation</b>	<b>MRID #</b>
<b>GLN Nos. 830.1550, 830.1600, 830.1620, 830.1670, 830.1700, 830.1750, 830.1800</b>		
3 of 4	Cooke, A., (2013) Technical Cyclanilide, NUP-12064 - Product Identity and Process, October 18, 2013; Study No. RTP-13-063-REG, 12 pages	49210402
<b>GLN Nos. 830.6302, 830.6303, 830.6304, 830.6313, 830.6314, 830.7000, 830.7050, 830.7300, 830.7370</b>		
4 of 4	Wen, H., (2013) Chemical and Physical Characterization of Cyclanilide TGA1: Color, Physical State, Odor, Stability, Oxidation/Reduction, pH, UV-Vis, Density and Dissociation Constant; September 5, 2008; Study No. NC-2013-027, 96 pages.	49210403